

## Written Consultation Submission: WHO

Submission from World Health Organization (WHO)

### *Screening Question - Lead in paint*

Lead is a multi-system toxicant for which no safe level of exposure has been identified. Exposure to lead can cause chronic and debilitating health impacts in all age groups, and children are particularly vulnerable to its neurotoxic effects. The widespread use of lead has caused extensive environmental and human exposure across the globe. One major source of exposure, particularly for children, is through “lead paint”, or paint to which lead compounds have been added as pigments, drying agents or anti-corrosives.

Among others, “Lead in Paint” was recognized as an issue of concern under the second session of the International Conference on Chemicals Management (ICCM2) in 2009. The ICCM2 also endorsed the establishment of an international partnership, the Global Alliance to Eliminate Lead Paint (GAELP), to assist in phasing out lead paint worldwide. The GAELP aims to have all countries adopt “legally binding laws, regulations, standards and/or procedures to control the production, import, sale and use of lead paints with special attention to the elimination of lead decorative paints and lead paints for other applications most likely to contribute to childhood lead exposure” and to have all paint manufacturers eliminate “the use of added lead compounds in priority areas” by 2020.

Please visit the two-page factsheet on [Lead in Paint](#) for more information on the topic.

1. **Entry question:** Would you like to provide responses on this issue of concern? *(If you select a "No" option, you may move to the next issue of concern, Nanotechnology and manufactured nanomaterials)*
  - Yes**
  - No, I do not know enough about this issue*
  - No, this issue is not relevant to my country or institution*
  - No, other*
  - a. If you selected "No, other" in the previous question, please elaborate here:

## Technical Questions - Lead in paint

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Please visit the two-page factsheet on [Lead in Paint](#) for more information on the topic.

### Please answer the questions below that are relevant to your organization/ country/ region:

1. Do you agree with the assessment report that further international action is necessary\*? *(If you select "No", you are welcome to answer the questions below or you may proceed directly to question 9)*

- Yes
- No
- Don't know

a. Please provide a brief explanation for your response\*. \_\_\_\_\_

- Lead is a cumulative toxicant with chronic and debilitating impacts on multiple body systems. Lead can affect all age groups but young children and pregnant women are particularly vulnerable, with impacts on neurodevelopment and IQ. Globally, exposure to lead is attributed to 0.9 million premature deaths per year, primarily due to cardiovascular disease. Evidence continues to emerge that cardiovascular impacts and consequent disease burdens may be significantly higher. No safe level of exposure to lead has so far been established and reducing the adverse health effects from lead in paints can only come from prevention - reducing and eliminating sources of exposures as far as possible.
- Paint is one of the sources of exposure to lead where interventions are relatively straightforward. Lead is not needed in paint and increasingly countries are instituting lead paint laws to strictly control their use.
- Despite knowledge of the harmful effects and widespread exposure to lead from paint, the testing of residential paints on the market still shows that unacceptable levels of lead

compound are added to paint to give it certain characteristics e.g. colour, rapid drying and corrosion resistance. In 2011, WHO and the United Nations Environment Programme (UNEP) joined forces to establish the Global Alliance to Eliminate Lead Paint with the overall goal of preventing children's exposure and minimizing occupational exposure to lead paints. Focusing on advocating and assisting countries to improve national and regional regulations, the number of countries with legally binding laws restricting the use of lead has almost doubled from 51 countries with lead paint laws in 2013 to 93 in March 2023. Further concerted efforts are still needed to reach the goal of all countries with regulations in place outlawing the use of lead.

2. What types of international actions should be taken? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*

*Legally binding*

- Soft law*
- Information sharing and awareness/ Voluntary initiatives*
- No international actions are needed*
- Other \_\_\_\_.*

- a. Please explain your response, including examples if possible\*. \_\_\_\_\_

The Lead Paint Alliance' broad objective is to promote the global phase-out of lead paint through the establishment of legally binding control measures in every country to limit the lead content in paints, varnishes and coatings.

Establishing legally binding controls are needed to stop the addition of lead to paint. Governments around the world have already agreed that lead paint should be phased out to protect human health and the environment. The most effective way to do this is for each country to establish legally binding control measures, as the most effective way to eliminate exposure to lead paint.

Depending on the legal framework in the country, a lead paint law can include statutes, regulations, and/or mandatory technical standards establishing a binding, enforceable limit on lead in paint with penalties for non-compliance. Voluntary control measures are of limited effectiveness because they cannot be enforced.

As of March 2023, 48% of countries had legally binding control measures to prevent the manufacture, distribution, sale and import of lead paint, meaning that in most countries lead paints are still potentially available and in use.

Without legally binding measures to ban the use of lead in paint, lead paint will remain a source of lead exposure and a risk to public health, as well as the integrity of ecosystems. It is more cost-effective to prevent the lead hazard at its source, i.e. to stop the manufacture of lead paint, than to deal with the costly legacy issues of ageing, peeling paint on walls and other surfaces and to manage the adverse health effects on populations exposed to lead from paint.

3. Which type of approach or measure would you see as appropriate to address this issue at the international level? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*

Regulatory control measures

Information based and enforcement tools (such as Scientific and technical and guidelines, Guidelines and tools for enforcement, Awareness tools (including of consumers))

- Options / guidance for economic instruments*  
 *Voluntary measures and approaches: (such as Guidelines, principles and strategies)*

Measures supporting science-based knowledge and research

- Other: \_\_\_\_\_*

- a. Please explain your response, including examples if possible: \_\_\_\_\_

Regulatory controls on a range of sources of lead exposure have been demonstrated to protect public health, as reflected in declining population level blood lead concentrations in many countries.

Primary prevention (i.e. the elimination of exposure to lead at its source) is the single most effective intervention against lead poisoning. Extend the monitoring of blood lead levels in children and women of childbearing age by use of sensitive analytical methods is one of the measure to mitigate risk of lead exposure.

While the health hazards of lead paint have long been known, new regulatory action in countries to prevent lead exposure from paint has been stimulated by the recognition of the problem at the global level and the development of global initiatives.

More specifically, the [Lead Paint Law Compliance and Enforcement Guidance](#) describes key elements of compliance and enforcement strategies for government officials, with examples from countries that have enacted lead paint laws and examples of actions paint manufacturers and importers can take to demonstrate compliance.

Targeted awareness-raising should be conducted among relevant government ministries, the public, health professionals and industry, on topics including the adverse health and economic impacts of lead, lead paint as a source of exposure, alternatives to lead ingredients in paint and the positive impact of lead paint laws on eliminating lead paint. The Lead Paint Alliance can provide the advice or information, as available and feasible. In terms of awareness-raising to promote development of a lead paint law, provision of existing WHO information on health impacts of lead exposure or Lead Paint Alliance information on the recommended regulatory limit on lead in paint, coordination or advice for conducting awareness-raising events can be considered.

To further galvanize action, every year, the International Lead Poisoning Prevention Week (ILPPW) is organized by WHO . This year's ILPPW to be held 22-28 October 2023 and will focus on children's environmental health in relation to lead exposure.

During ILPPW event organizers join together to create a global network of events which are registered on the WHO ILPPW Website. In 2022, there were 107 events in 57 countries around the world organized by community groups, public health departments, academia, government departments and others.

4. What factors prevent action/progress on addressing the issue in your country/ organization  
(Multiple answers based on list below)?

*Lack of technical capacity*

*Lack of scientific knowledge*

*Difficulties in sharing knowledge and coordinating action among different stakeholders and across sectors*

*Difficulty with resource mobilisation*

*Lack of economically feasible green and sustainable alternatives*

*Only coordinated international action can address the issue (e.g., due to transboundary effects, or prevalence of chemicals in international trade)?*

*None, there are no factors preventing action or progress*

*Other: \_\_\_\_\_ Lack of regulatory infrastructure, Lack of prioritization of the issue \_\_\_\_\_*

a. Please explain your response, including examples if possible: \_\_\_\_\_

Considerable progress has been made in eliminating lead paint in the time since 2009 with the ICCM2 resolution identifying lead in paint as a emerging policy issue. The work of the Global Alliance to Eliminate Lead Paint has encouraged collaboration and sharing resources and has established an important momentum towards the resolving the issue. With additional effort the resolution of the issue can be achieved.

Even so there remains at least 73 countries that do not have legally binding restrictions on lead paint. Work is in progress in 31 of these. The remaining 42 countries can provide important insights into the factors preventing completion of the goal of global elimination of lead paint.

Countries without laws may remain insufficiently aware that lead paint should be eliminated, or lack basic chemicals regulatory arrangements, political priority or evidence that lead paint is being used in their countries. Small and medium enterprises may face obstacles including a lack of know-how for reformulation. Some countries with limited regulation for chemicals may wish to improve their chemicals regulatory framework, gain specific expertise for conducting regulatory impact assessments, or learn how to prevent imports of pigments containing lead and promote compliance.

The additional funding boost of 3 Million USD provided by the Global Environment Facility was a success in mobilising 6 Million USD in co-financing. Such resources assisted an increase in the rate and number of countries implementing legally binding measures to enable 21 countries to enact laws for lead in paint and another 19 countries to establish that are in final stages of enactment. The project also assisted twenty-five paint producers in 7 countries to complete lead paint reformulation pilots to demonstrate the production of paint without added lead components.

The GEF project also assisted the Global Alliance to prepare and disseminate a substantial range of tools and resources including general advocacy and awareness materials, technical information and policy briefs; Q &As; annual updates on the status of countries' legal limits, videos and graphic materials. Technical resources include a model law and guidance on regulating lead paint (2018); an online toolkit for establishing laws to eliminate lead paint; guides to measuring lead in paint and measuring lead in blood (2020); technical guidelines on reformulating lead paint (2022); and a guide to lead paint compliance and enforcement (2023).

5. Can you point to existing initiatives that could be replicated or scaled up at the international level? *(Open space answer. Please share a weblink to the initiative(s) if available).*

*The Global Alliance to Eliminate Lead Paint is an existing initiative of WHO and UNEP which is well placed to assist remaining countries to eliminate lead paint.*

6. Which sectors/value chains need to be closely involved in developing solutions? *(Multi-choice. Please visit the two-page factsheet on [Lead in Paint](#) for more information on the topic. If you select "Other", please elaborate your response).*

*Agriculture and food production*

*Construction*

*Electronics*

*Energy*

*Health*

*Labour*

*Pharmaceuticals*

*Public, private, blended finance*

*Retail*

*Textiles*

*Transportation*

*Waste*

*Other: \_\_\_\_\_*

7. Which international forum or instrument would be best placed to take the lead on international action on this issue? *(Open space to elaborate. Please provide specific examples of e.g., intergovernmental bodies, multilateral agreements within or outside the chemicals and waste cluster, international instruments...).*

Global Alliance to Eliminate Lead Paint with small additional boost of financial support for country-work

- a. Which international agendas have important linkages with this issue of concern? *(Multiple answers based on list below. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)):*

- Agriculture and Food
- Biodiversity
- Climate Change

x Health

- Human Rights

x Sustainable Consumption and Production

x World of Work

- Other \_\_\_\_\_

- b. Please explain your response, including examples if possible. *(Open space question. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)):*

8. What priority level do you attach to this issue for international action?

X Very high as the issue is close to being addressed

- High,
- Medium,
- Low,
- Very low

9. Is there any priority further work you would like to suggest at the national level\*? *(Open space to elaborate. Please share a weblink to the suggestion(s) if available).*

Through the Alliance, UNEP and WHO can continue to play an important role in promoting national action however further recognition of the global importance and necessary momentum to complete the task is needed. High-level support for reducing exposure to lead has recently come from the G7 Climate,

Energy and Environment Ministers communique in May 2022 and 2023. Additional work and support in this forum is ongoing.

10. Is there any priority further work you would like to suggest at the regional level\*? *(Open space to elaborate. Please share a weblink to the suggestion(s) if available).*

Considerable progress has been made working in regional economic groups – such as the European Union, League of Arab States and ECOWAS (partially complete) – such regional work can be helpful in sharing resources such as legal drafting as well as identifying higher political commitment to addressing the issue.